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25 **UNITED STATES DISTRICT COURT**

26 **NORTHERN DISTRICT OF CALIFORNIA**

27 **SAN FRANCISCO DIVISION**

28 **IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al., Case
No. 3:20-cv-05671-JD

In re Google Play Consumer Antitrust
Litigation, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al., Case
No. 3:21-cv-05227-JD

Match Group, LLC et al. v. Google LLC et al.,
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF TIAN LIM IN
SUPPORT OF GOOGLE'S
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. James Donato

1 I, Tian Lim, declare as follows

2 1. I was formerly employed as a vice president at Google from November 2017 to
3 January 2023. I submit this declaration in support of Google's Administrative Motion to File
4 Under Seal filed on February 14, 2023 in the above captioned matters. The following facts are
5 true of my personal knowledge and, if called to testify, I can and will competently testify thereto.

6 2. On January 12, 2023, I sat for a deposition in the above captioned matters relating
7 to a hearing before this Court. *See* Court's January 10, 2023 Minute Order (Dkt. 406). During
8 the deposition, I was asked about PX-170, a document I recognized as a true and correct copy of
9 my working notes I kept during my tenure at Google. I kept these notes as part of my
10 management role at Google, which, in part, required me to evaluate other employees who
11 reported to me and provide feedback regarding their performance. These notes contain sensitive
12 and potentially embarrassing information, including my candid evaluation of other current and
13 former employees at Google – and identifies these employees by name. For example, from
14 Pages -393 to -396, I recorded a chat with another executive at Google regarding that executive's
15 candid impressions of one of my direct reports. I believe that revealing the names of the
16 executive and direct report would cause embarrassment for all persons named. Similarly, at Page
17 -406, I detailed feedback to another direct report and, if the employee's name were disclosed,
18 would be embarrassing for both the employee referenced and me. In addition, PX-170 includes
19 personally identifiable information ("PII"), in the form of email addresses, which implicates the
20 privacy interests of non-parties.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
22 14th day of February 2023 in San Mateo, California.

23 DocuSigned by:

24 
Tian Lim

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Tian Lim